

**In response to question 9.**

WWIE qualifies for the streamlined process because it is affiliated with foreign carrier and fits the below description:

(iii) The affiliated foreign carrier owns no facilities, or only mobile wireless facilities, in that destination market. For this purpose, a carrier is said to own facilities if it holds an ownership, indefeasible-right-of-user, or leasehold interest in bare capacity in international or domestic telecommunications facilities (excluding switches);

WWIE's parent company and affiliates own mobile wireless operations in destination markets. WWIE is fully owned and operated by Western Wireless International Corporation, a US company and 96% owned subsidiary of Western Wireless Corporation [NASDAQ: WWCA].

Western Wireless Corporation, WWIE, and other subsidiaries do not have a dominant position in any of the destination markets.

WWIE as a new entrant and through its affiliation with Western Wireless Corporation does not have market power. Therefore, by granting this application, the Commission will serve the public interest, convenience and necessity by promoting competition in the international services market. Competition will benefit both international and U.S. consumers by increasing service options and lowering prices. Thus, the public interest will be served by the grant of Section 214 authority to WWIE.

**In response to question 11.**

Section 63.18(i) through (m).

- (i) WWIE will be an US based carrier. WWIE is not a carrier in any other country. WWIE is affiliated with foreign carriers that own only mobile wireless facilities. Furthermore, neither WWIE nor any of its affiliates are dominant carriers in their respective country.

They are:

USA - Western Wireless Corp.  
Austria - Tele.ring Telekom Service GmbH  
Ireland - Meteor Mobile Communications Limited ("Meteor")  
Slovenia - Western Wireless International d.o.o.  
Iceland - TAL  
Croatia - VIPnet GSM d.o.o.  
Georgia - MagtiCom GSM, Ltd. ("MagtiCom"),  
Bolivia -  
Haiti - Communication Cellulaire d'Haiti ("COMCEL")  
Ghana - Western Telesystems (GH), Ltd. ("Westel"),  
Ivory Coast - Comstar Cellular

(j.1) WWIE will be a carrier in the US. It does not operate as a foreign carrier in any other country.

(j.2) WWIE does not control any foreign carrier.

(j.3) WWIE is affiliated with foreign carriers that own only mobile wireless facilities. Furthermore, neither WWIE nor any of its affiliates are dominant carriers in their respective country.

The affiliates are:

USA - Western Wireless Corp.  
Austria - Tele.ring Telekom Service GmbH  
Ireland - Meteor Mobile Communications Limited ("Meteor")  
Slovenia - Western Wireless International d.o.o.  
Iceland - TAL  
Croatia - VIPnet GSM d.o.o.  
Georgia - MagtiCom GSM, Ltd. ("MagtiCom"),  
Bolivia -  
Haiti - Communication Cellulaire d'Haiti ("COMCEL")  
Ghana - Western Telesystems (GH), Ltd. ("Westel"),  
Ivory Coast - Comstar Cellular

(j.4) Western Wireless International and Western Wireless Corp. are the parent companies of WWIE. No one or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the applicant and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.

(k) WWIE as a new entrant and through its affiliation with Western Wireless Corporation **does not have market power**. Therefore, by granting this application, the Commission will serve the public interest, convenience and necessity by promoting competition in the international services market. Competition will benefit both Haitian and U.S. consumers by increasing service options and lowering prices. Thus, the public interest will be served by the grant of Section 214 authority to WWIE.

(l) To satisfy § 63.10(a)(3), neither WWIE nor its affiliates are monopoly or dominant carriers in any country.

(m) WWIE qualifies as a non-dominant carrier based on the descriptions § 63.10(a)(3). As stated above, WWIE's affiliate operations **are not a monopoly or dominant carrier in any country**. Further, all of the affiliates **lack 50 percent market share in the international transport and the local access markets** on the foreign end of the route. Hence, WWIE shall presumptively be classified as non-dominant.

#### **In response to question 12.**

Yes. WWIE plans to provide international telecommunications services to all destinations including to the countries listed below where it controls a foreign carrier. The name of the affiliated company is shown. They are wireless operations, some with international carrier licenses in their respective country. None have 50 percent market share in the international transport or the local access markets

USA - Western Wireless Corp.  
Austria - Tele.ring Telekom Service GmbH  
Ireland - Meteor Mobile Communications Limited ("Meteor")  
Slovenia - Western Wireless International d.o.o.

Iceland - TAL  
Croatia - VIPnet GSM d.o.o.  
Georgia - MagtiCom GSM, Ltd. ("MagtiCom"),  
Bolivia -  
Haiti - Communication Cellulaire d'Haiti ("COMCEL")  
Ghana - Western Telesystems (GH), Ltd. ("Westel"),  
Ivory Coast - Comstar Cellular

**In response to question 15.**

(d) WWIE has not received authority previously under Section 214 of the Communications Act.

(e)(4) WWIE requests global facilities-based and resale Section 214 authority pursuant to the terms and conditions of Section 63.18(e)(1) and (e)(2) of the Commission's Rules. WWIE is not applying for authority to acquire facilities or to provide services not covered by paragraphs (e)(1) through (e)(3).

(g) Applicant is not seeking facilities-based authority under paragraph (e)(4) of Section 63.18.